

**To:** Smith, Madelyn[madelyn.smith@epa.ohio.gov]  
**From:** Patterson, Leslie  
**Sent:** Tue 2/11/2014 8:40:03 PM  
**Subject:** RE: SDD&L - Request Response on OU1 Groundwater Definition

Maddie,

You asked for a written explanation of why EPA is not requiring the PRPs to investigate deep groundwater (below 675 ft asl) at the South Dayton Dump and Landfill Superfund Site (Site) as part of the OU1 combined hot spot and groundwater investigation (investigation).

1. The overall purpose of the investigation is to identify source areas of groundwater contamination for treatment prior to installation of the landfill cap. Demonstrating that groundwater contamination is migrating outside of the waste will probably require tracking plumes some distance beyond the waste, but complete plume delineation is unnecessary for the purpose of the investigation.
2. We must distinguish site-related contamination vs. non-site-related contamination in the deep aquifer before we can really address the deep groundwater. This will require additional off-site investigations that would delay the remedial process in OU1. By remaining focused on source areas within the waste, we can collect the information we need to address source-area groundwater on a shorter time scale.
3. At the current time, EPA has no legal instrument to require groundwater investigations as part of a presumptive remedy approach. The 2006 AOC-FS, page 3, states:

*Unless otherwise agreed to by U.S. EPA, a conventional RI/FS, baseline human health risk assessment and ecological assessment shall be conducted for...Groundwater within and outside the Presumptive Remedy Area...*

And the 2010 Dispute Resolution, page 4 states:

*The Parties further agree that EPA withdraws its comments on the Streamlined Feasibility Study Report Operable Unit One (OU 1) (OU 1 FS Report) which required presentation of an alternative for OU 1 to address containment of shallow groundwater as part of the Presumptive Remedy for OU 1.*

Hope this helps – call me to continue discussing this if you wish.

Leslie Patterson

Remedial Project Manager

U. S. Environmental Protection Agency, Region 5

Superfund Remedial Response, SR-6J

77 West Jackson Boulevard

Chicago, IL 60604

tel: (312) 886-4904

fax: (312) 692-2491

[patterson.leslie@epa.gov](mailto:patterson.leslie@epa.gov)

**From:** Smith, Madelyn [mailto:madelyn.smith@epa.ohio.gov]

**Sent:** Tuesday, February 11, 2014 12:08 PM

**To:** Patterson, Leslie

**Subject:** SDD&L - Request Response on OU1 Groundwater Definition

Leslie,

I don't want to be a pain, but I have to brief my management on our call today – do you think you'd be able to get me the statement of OU1 ground water this afternoon? Specifically, can you define "source area ground water". My review of the Phase 2 proposal was under the position that source area ground water includes all of the ground water beneath OU1, regardless of depth. From our call today we discussed a different definition of OU1 groundwater subject to the presumptive remedy of containment. For future review of the documents, it would be helpful if you could defined the media under OU1 and the media under OU2 (that is, what is subject to the presumptive remedy and what will get a traditional RI/FS).

I will be working this afternoon on revising my comments for the current work plan – I will get you any changes as soon as possible.

Maddie

*Madelyn Smith*

Site Coordinator – Ohio EPA, Southwest District Office

Division of Environmental Response and Revitalization

401 E. 5th Street

Dayton, OH 45402

937-285-6456

*\*\*Ohio EPA's email addresses are changing. Please update your contact information to the new extension @epa.ohio.gov*